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VIA ELECTRONIC COMMENT FILING SYSTEM

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, DC 20554

**Re: Capital Telecommunications, Inc.
Docket No. 06-36**

Dear Secretary Dortch:

Enclosed for filing in the above-referenced docket, please find the annual CPNI compliance certification of Capital Telecommunications, Inc., prepared in accordance with section 64.2009(e) of the Federal Communications Commission's rules, 47 C.F.R. § 64.2009(e).

Please direct any questions regarding this filing to the undersigned at 202.408.6479.

Respectfully submitted,



Wendy M. Creeden

Enclosure

cc: FCC Enforcement Bureau, Telecommunications Consumers Division
Best Copy and Printing, Inc.

Capital Telecommunication, Inc.
Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for calendar year 2007.

Name of Company: Capital Telecommunications, Inc.

Form 499 Filer ID: 822110

Name of Signatory: Christopher McKee

Title of Signatory: General Counsel

I, Christopher McKee, certify that I am an officer of the company named above ("Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("Commission's") Customer Proprietary Network Information ("CPNI") rules. See 47 C.F.R. § 64.2001 *et seq.*

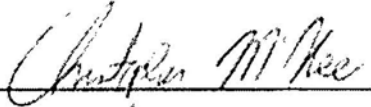
Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

During calendar year 2007, the Company did not receive any customer complaints concerning the unauthorized release of subscriber CPNI. The Company has not taken any actions (proceedings instituted or petitions filed at either state commissions, the court system, or at the Commission) against data brokers during calendar year 2007. The Company also has no knowledge or experience regarding the specific processes pretexters are using to attempt to access CPNI. The steps that the Company is taking to protect CPNI are described in the attached statement that summarizes the Company's operating procedures for compliance with the Commission's CPNI rules.

This certification is made to the best of my knowledge, information and belief.

Signed: _____

Dated: _____


2/29/08

STATEMENT REGARDING OPERATING PROCEDURES GOVERNING CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

The following statement explains the operating procedures established by Capital Telecommunications, Inc. ("CTI" or "Company") to ensure that it is in compliance with the Federal Communications Commission's CPNI rules.

A. CTI uses CPNI internally for the purpose of providing a customer with the requested service and marketing service offerings among the category/ies of service to which the customer already subscribes from CTI. In the absence of customer approval, CTI does not use, disclose, or permit access to CPNI to market service offerings that are within a category of service to which the subscriber does not already subscribe from CTI. CTI may also use CPNI internally for the following actions:

- to initiate, render, bill, and collect for its telecommunications services;
- to protect the rights or property of the Company, or to protect users of those services and other service providers from fraudulent, abusive, or unlawful use of, or subscription to, such services;
- to provide inbound telemarketing, referral, or administrative services to the subscribers for the duration of the call, if such call is initiated by the subscriber and the subscriber approves of the use of such CPNI to provide such service;
- for purpose of providing customer premise equipment ("CPE") and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, protocol conversion;
- for the provision of inside wiring, installation, maintenance, repair services, and
- to market services formerly known as adjunct services, such as, but not limited to, speed dialing, computer provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding and certain Centrex features.

B. The Company serves business subscribers only and, therefore, the Company assigns a dedicated account representative to each subscriber and requires that each business subscriber have a contractual arrangement that addresses the protection and safeguarding of CPNI.

C. Company discloses CPNI upon affirmative written request by the subscriber to any person designated by the subscriber. The Company requires that the subscriber's written request be verified.

D. Within 7 days of a reasonable determination of breach (*i.e.*, CPNI disclosed to a third party without subscriber authorization), the Company will notify the US Secret Service ("USSS") and Federal Bureau of Investigation ("FBI") of the breach via the central reporting facility www.fcc.gov/cb/cpni.

- After 7 days of USSS and FBI notice, if Company has not received written direction from USSS or FBI, Company will notify the subscriber of the breach, unless the USSS and FBI have extended the period for such notice.
- For 2 years following USSS and FBI notice, Company will maintain a record of (1) discovered breaches; (2) notifications to USSS and FBI; (3) USSS and FBI responses; (4) dates breaches discovered; (5) dates INS notified USSS and FBI; (6) details of CPNI breached; and (7) circumstances of breaches.
- If there is a possibility of immediate and irreparable harm, Company may notify the subscriber immediately after consultation with law enforcement.

E. The Company employees are trained as to the proper protection, uses and treatment of CPNI, including familiarity with the Company's internal CPNI policies and procedures.

F. In the event that the Company uses CPNI for sales or marketing campaigns, the Company will maintain a record of sales and marketing campaigns that use CPNI, including any instances when CPNI is disclosed or provided to third parties or when third parties are allowed access to CPNI. The record is required to include a

description of each campaign, the specific CPNI that was used in the campaign, what products and services were offered as part of the campaign. Such records are required to be retained for at least 1 year following the sales and marketing campaign.

G. The Company maintains a supervisory review process regarding compliance with the rules for outbound marketing situations and maintains records of compliance for a minimum of 1 year following the supervisory review. Sales personnel are required to obtain supervisory approval of any proposed outbound marketing request for subscriber approval.

H. The Company employs appropriate remedies against those persons violating the Company's internal CPNI policies and procedures. Remedies may include, but are not limited to, financial, legal or disciplinary actions including termination and referrals to law enforcement when appropriate.